

UNITED STATES DISTRICT COURT

DISTRICT OF MARYLAND

UNITED STATES)
)
v.) Crim. No. GJH19CR028
) Judge Hazel
LARRY FRANCIS NEWMAN, JR.)

**DEFENDANT NEWMAN'S MOTION/NOTICE OF INTENTION TO INTRODUCE
TRIAL TRANSCRIPT INTO EVIDENCE AT TRIAL**

Defendant, Larry F. Newman, Jr., through undersigned counsel, hereby moves/provides notice of Mr. Newman's intention to introduce into evidence certain parts of the Trial Transcript in *United States v. Barudi Faison*.

1. In October 2020, the Government tried the case of *United States v. Bardi Faison*, 8:19CR00027-GJH, before this Court.

2. Counsel for the Government were the same Government counsel as in the instant case.

3. The Government called several police/Government agent witnesses in their case.

4. Mr. Newman intends to read to the jury in the instant case the transcript of the Government's police/Government agent witnesses in the *Faison* case.

5. This police/Government agent witness testimony is as follows, from Volume II, October 9, 2020:

John McIntosh, pp. 27-60;

Tyrone Thomas, pp. 63-69;

Allan Mandujano, pp. 70-73;
Jaime Roshner, pp. 79-87;
Christopher Szakolczai, pp. 93-102; 110-116;
Matthew Leonard, pp. 117-137;
Jaime Roshner, pp. 140-145.

Respectfully submitted,

/S/
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of July, 2021, a copy of the foregoing Motion/Notice was sent via ECF to: AUSA Elizabeth G. Wright, United States Attorney's Office for Maryland, 6406 Ivy Lane, Suite 800, Greenbelt, MD 20770.

/S/
Peter L. Goldman